

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

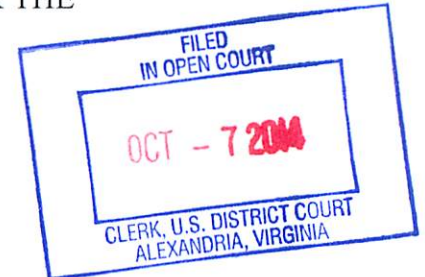
v.

ROLANDO FELICIANO

Defendant.

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CRIMINAL NO. 1:14-CR-261



STATEMENT OF FACTS

Had this matter gone to trial, the United States would have proved beyond a reasonable doubt the following:

1. In or about July 2013, within the Eastern District of Virginia and elsewhere, the Defendant, Rolando Feliciano, began communicating with a 13-year-old juvenile through the use of the social media internet site Facebook. During the course of the Defendant's contact with the juvenile, the Defendant resided in New Jersey, and the juvenile resided within the Eastern District of Virginia.
2. Between July 2013 and March 2014, the Defendant and the juvenile engaged in sexually explicit conversations by phone, through text messaging, and through the use of the communication application, Facetime. These sexually explicit conversations were knowingly engaged in by the Defendant for the purpose of inducing or persuading the juvenile to engage in conduct connected with the active pursuit of libidinal gratification.
3. Through the course of this communication, the juvenile sent and the Defendant received through the use of a means of interstate commerce an image that depicted the lascivious exhibition of the genitals and pubic area of the juvenile.

4. In addition, between July 2013 and March 2014, the Defendant knowingly used a means of interstate commerce, including telephone and the internet, to arrange a meeting with the juvenile within the Eastern District of Virginia. The Defendant thereafter traveled in interstate commerce from New Jersey to the Eastern District of Virginia for the purpose of engaging in sexual activity in violation of 18.2-67.4:2 of the Code of Virginia.

5. On March 14, 2014, the Defendant was arrested in the Eastern District of Virginia, and evidence of sexually explicit communications between the Defendant and the juvenile was found on the Defendant's phone.

6. The purpose of this statement of facts is to admit conduct in violation of the charged offenses of travel with intent to engage in illicit sexual conduct in violation of 18 U.S.C. § 2423(b) and receipt of child pornography in violation of 18 U.S.C. § 2252(a)(2), as well as the offense of enticement in violation of 18 U.S.C. § 2422(b), in accordance with § 1B1.2(a) of the U.S. Sentencing Guidelines.

The Defendant engaged in the conduct outlined above knowingly and intentionally and not by mistake or accident.


Dana J. Boente
United States Attorney

By: Matt Gardner
Matt J. Gardner
Assistant United States Attorney

Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into with the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date: Oct 7, 2014 
Rolando Feliciano
Defendant

Defense Counsel Signature: I am counsel for the defendant in this case. I have carefully reviewed the Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: Oct 7, 2014 
Jeremy C. Kamens
Counsel for the Defendant